

LAW OFFICES OF
JAMES P. NOLAN
&
ASSOCIATES
A Limited Liability Company

James P. Nolan, Jr.
Certified Criminal Trial Attorney
Fredrick L. Rubenstein
Eric L. Lange
Admitted in NJ & NY
Sanford Rader
Of Counsel

February 8, 2011

Via Electronic Filing

William T. Walsh, Clerk
United States District Court
District of New Jersey
M.L. King, Jr. Federal Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: Erin Walsh v. Township of South Orange, et al.
Our File No. 102073
D/A. 02/09/09

Dear Mr. Walsh:

Please be advised that the firm represents the Plaintiff, Erin Walsh, with respect to the above-captioned matter. Enclosed herewith please find the following:

1. Complaint, Jury Demand and Designation of Trial Counsel;
2. Civil Cover Sheet; and
3. Summons.

Kindly file the Complaint and provide the undersigned with a "filed" copy of same at your earliest convenience.

Thank you for your kind attention to this matter.

Very truly yours,

Eric L. Lange

ELL/amy
Enc.

JS 44 (Rev. 12/07, NJ 5/08)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

ERIN WALSH, PLAINTIFF

(b) County of Residence of First Listed Plaintiff MIDDLESEX

(c) Attorney's (Firm Name, Address, Telephone Number and Email Address)

Eric L. Lange, Esq. c/o James P. Nolan & Assoc.
61 Green St. Woodbridge, NJ 07095
TEL: (732) 636-3344 FAX: (732) 636-1175
elange@jpnlaw.us

DEFENDANTS

TWP OF SOUTH ORANGE, TWP OF SOUTH ORANGE POLICE DEPT., CITY OF ORANGE, CITY OF ORANGE

County of Residence of First Listed Defendant ESSEX

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

<input type="checkbox"/> 1 U.S. Government Plaintiff	<input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)
<input type="checkbox"/> 2 U.S. Government Defendant	<input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Citizen of This State	PTF	DEF	PTF	DEF
	<input checked="" type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4 <input checked="" type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5 <input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6 <input type="checkbox"/> 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	PERSONAL INJURY	PERSONAL INJURY	<input type="checkbox"/> 610 Agriculture	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 362 Personal Injury - Med. Malpractice	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	PROPERTY RIGHTS	<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers' Liability	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 820 Copyrights	<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 830 Patent	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans)	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 480 Consumer Credit
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input checked="" type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 385 Property Damage Product Liability	SOCIAL SECURITY	<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 390 Other Personal Injury	<input type="checkbox"/> 861 HIA (1395f)	<input type="checkbox"/> 810 Selective Service
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 360 Other Personal Injury	LABOR	<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 850 Securities/Commodities/ Exchange
<input type="checkbox"/> 195 Contract Product Liability		<input type="checkbox"/> 710 Fair Labor Standards Act	<input type="checkbox"/> 863 DIWC/DIW (405(g))	<input type="checkbox"/> 875 Customer Challenge 12 USC 3410
<input type="checkbox"/> 196 Franchise		<input type="checkbox"/> 720 Labor/Mgmt. Relations	<input type="checkbox"/> 864 SSID Title XVI	<input type="checkbox"/> 890 Other Statutory Actions
REAL PROPERTY	CIVIL RIGHTS	<input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act	<input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 891 Agricultural Acts
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 740 Railway Labor Act	FEDERAL TAX SUITS	<input type="checkbox"/> 892 Economic Stabilization Act
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 790 Other Labor Litigation	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)	<input type="checkbox"/> 893 Environmental Matters
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 443 Housing/ Accommodations	<input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 894 Energy Allocation Act
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 444 Welfare	IMMIGRATION		<input type="checkbox"/> 895 Freedom of Information Act
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment	<input type="checkbox"/> 462 Naturalization Application		<input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice
<input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 446 Amer. w/Disabilities - Other	<input type="checkbox"/> 463 Habeas Corpus - Alien Detainee		<input type="checkbox"/> 950 Constitutionality of State Statutes
	<input checked="" type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 465 Other Immigration Actions		

V. ORIGIN

(Place an "X" in One Box Only)

<input checked="" type="checkbox"/> 1 Original Proceeding	<input type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Remanded from Appellate Court	<input type="checkbox"/> 4 Reinstated or Reopened	<input type="checkbox"/> 5 Transferred from another district (specify) _____	<input type="checkbox"/> 6 Multidistrict Litigation	<input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judgment
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VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
42 U.S.C. 1983Brief description of cause:
police pursuit violated plaintiff's civil rights

VII. REQUESTED IN COMPLAINT:

 CHECK IF THIS IS A CLASS ACTION
UNDER F.R.C.P. 23DEMAND \$
1,000,000.00CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VIII. RELATED CASE(S)

(See instructions):

JUDGE

DOCKET NUMBER

Explanation:

2/8/11

DATE

SIGNATURE OF ATTORNEY OF RECORD

JAMES P. NOLAN AND ASSOCIATES, L.L.C.
61 GREEN STREET
WOODBRIDGE, NEW JERSEY 07095
TELEPHONE: (732) 636-3344 FACSIMILE: (732) 636-1175
Attorneys for Plaintiff, Erin Walsh

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

ERIN WALSH, :
: Plaintiff, : Civil Action No.
: :
-v- : : CIVIL ACTION
TOWNSHIP OF SOUTH ORANGE, :
TOWNSHIP OF SOUTH ORANGE :
POLICE DEPARTMENT, CITY OF : COMPLAINT, JURY DEMAND AND
ORANGE, CITY OF ORANGE POLICE : DESIGNATION OF TRIAL COUNSEL
DEPARTMENT, and JOHN DOES :
1-10 :
: Defendants.

Plaintiff, Erin Walsh, residing at 238 Mawbey Street, Township of Woodbridge, County of Middlesex and State of New Jersey by way of Complaint against the Defendants says:

JURISDICTION

1. This Court has jurisdiction to decide the claims raised by Plaintiff by virtue of 28 U.S.C. Sec. 1331 which provides for original jurisdiction of all civil actions in the district courts arising under the Constitution, laws, or treaties of the United States. Plaintiff further invokes the pendent jurisdiction of this Court to consider claims under State Law, required notice having been given pursuant to New Jersey Law.

2. Venue is proper under 28 U.S.C. Sec. 1391(b) in the District of New Jersey.

FIRST COUNT

1. Upon information and belief, the Defendant, Township of South Orange, is a Municipal Corporation with its principal place of business located at Village Hall, 101 South Orange Avenue, South Orange, New Jersey 07079.

2. Upon information and belief, the Defendant, Township of South Orange Police Department, is a Department operated under the jurisdiction of the municipality of the Township of South Orange and within an apportionment of the Township's total operating budget with its principal place of business located at 201 South Orange Avenue, South Orange, New Jersey 07079.

3. Upon information and belief, the Defendant, City of Orange, is a Municipal Corporation with its principal place of business located at City Hall, 29 N. Day Street, Orange, New Jersey 07050.

4. Upon information and belief, the Defendant, City of Orange Police Department, is a Department operated under the jurisdiction of the municipality of the City of Orange and within an apportionment of the City's total operating budget with its principal place of business located at 29 Park Street, Orange, New Jersey 07050.

5. On or about February 09, 2009, Plaintiff's father, James J. Walsh, was a pedestrian at the intersection of South Orange Avenue and Vose Avenue in the Township of South Orange, when he was struck

by a motor vehicle which was operated by Frank Bradley, and owned by Tamiya O. Eure, which vehicle was traveling westbound on South Orange Avenue, Township of South Orange, County of Essex and State of New Jersey.

6. The motor vehicle which was operated by Frank Bradley, and owned by Tamiya O. Eure, was being pursued by police vehicles owned by the Defendants, Township of South Orange, Township of South Orange Police Department, City of Orange, City of Orange Police Department and John Does 1-10, in such a willful and wanton manner that it caused Frank Bradley's vehicle to strike the Plaintiff, Erin Walsh's, father, James J. Walsh.

7. At the time and place aforesaid, the actions of the Defendants, Township of South Orange, Township of South Orange Police Department, City of Orange, City of Orange Police Department and John Does 1-10, were so willful and wanton so as to constitute, willful misconduct and a willful wanton disregard of the safety of James J. Walsh, that said collision caused James J. Walsh to sustain severe injuries which eventually resulted in his death.

8. Plaintiff, Erin Walsh, daughter of James J. Walsh, witnessed the pursuit by the Defendants, Township of South Orange Police Department, City of Orange, City of Orange Police Department and John Does 1-10, that caused Frank Bradley's vehicle to strike the Plaintiff's, father, James J. Walsh.

9. As a direct and proximate result of the willful misconduct and willful wanton disregard of the safety of James J. Walsh, on the

part of the Defendants, Township of South Orange Police Department, City of Orange, City of Orange Police Department and John Does 1-10, Plaintiff has and continues to suffer severe and substantial psychological and emotional injuries which are permanent in nature and has and continues to incur medical expenses.

11. In compliance with the New Jersey Tort Claims Act, Plaintiff, Erin Walsh, presented to Defendants a Notice of Claim for Damages.

12. On or about April 06, 2009, in compliance with the New Jersey Tort Claims Act, Plaintiff, Erin Walsh, presented to Defendants a Notice of Claim for Damages in the time and manner prescribed by the New Jersey Tort Claims Act.

13. This action was commenced within two (2) years of the date of accident.

WHEREFORE, the Plaintiff, Erin Walsh, demands judgment against the Defendants, Township of South Orange, Township of South Orange Police Department, City of Orange, City of Orange Police Department and John Does 1-10, jointly severally or in the alternative, for compensatory damages, interest, punitive damages, attorneys fees, costs of suit and such other relief as the Court may deem just and proper.

SECOND COUNT

1. Plaintiff repeats and re-alleges each and every allegation contained in the First Count of the Complaint as if same were more fully set forth herein at length.

2. Defendants' conduct, while acting under the color of state law, involving the decision to pursue and the manner of pursuit amounts to an abuse of power that shocks the conscience and violates the Plaintiff, Erin Walsh's, constitutional rights under the United States Constitution, 42 U.S.C. 1983 and her Fourteenth Amendment substantive due process rights and is in violation of the Attorney General Guidelines.

3. As a direct and proximate result of the aforementioned police pursuit on the part of the Defendants, Township of South Orange Police Department, City of Orange, City of Orange Police Department and John Does 1-10, Plaintiff has and continues to suffer severe and substantial psychological and emotional injuries which are permanent in nature and has and continues to incur medical expenses.

WHEREFORE, the Plaintiff, Erin Walsh, demands judgment against the Defendants, Township of South Orange, Township of South Orange Police Department, City of Orange, City of Orange Police Department and John Does 1-10, jointly severally or in the alternative, for compensatory damages, interest, punitive damages, attorneys fees, costs of suit and such other relief as the Court may deem just and proper.

THIRD COUNT

1. Plaintiff repeats and re-alleges each and every allegation contained in the First and Second Counts of the Complaint as if same were more fully set forth herein at length.

2. At all times mentioned herein, it was the custom, policy, and the practice of the Defendants, Township of South Orange, Township of South Orange Police Department, City of Orange, City of Orange Police Department and John Does 1-10, to allow pursuits under the aforementioned circumstances, which resulted in a violation of Plaintiff's constitutional rights under the United States Constitution and 42 U.S.C. 1983 and 1986 et. seq.

3. As a direct and proximate result of this custom, policy, and practice on the part of the Defendants, Township of South Orange Police Department, City of Orange, City of Orange Police Department and John Does 1-10, Plaintiff has and continues to suffer severe and substantial psychological and emotional injuries which are permanent in nature and has and continues to incur medical expenses.

WHEREFORE, the Plaintiff, Erin Walsh, demands judgment against the Defendants, Township of South Orange, Township of South Orange Police Department, City of Orange, City of Orange Police Department and John Does 1-10, jointly severally or in the alternative, for compensatory damages, interest, punitive damages, attorneys fees, costs of suit and such other relief as the Court may deem just and proper.

FOURTH COUNT

1. Plaintiff repeats and re-alleges each and every allegation contained in the First, Second and Third Counts of the Complaint as if same were more fully set forth herein at length.
2. The Defendants, Township of South Orange, Township of South Orange Police Department, City of Orange, City of Orange Police Department and John Does 1-10, owed a duty to Plaintiff to adequately hire, train, and supervise its police officers to ensure that police officers properly engaged in police pursuits under the appropriate circumstances.
3. The Defendants, Township of South Orange, Township of South Orange Police Department, City of Orange, City of Orange Police Department and John Does 1-10, failure to exercise reasonable care in the hiring, training and supervision of the Police Officers involved in this pursuit violated Plaintiff's constitutional rights under the United States Constitution and 42 U.S.C. 1983 and 1986 et. seq.
3. As a direct and proximate result of the failure to exercise reasonable care in the hiring, training, and supervision of the Police Officers engaged in this pursuit on the part of the Defendants, Township of South Orange Police Department, City of Orange, City of Orange Police Department and John Does 1-10, Plaintiff has and continues to suffer severe and substantial psychological and emotional injuries which are permanent in nature and has and continues to incur medical expenses.

WHEREFORE, the Plaintiff, Erin Walsh, demands judgment against the Defendants, Township of South Orange, Township of South Orange Police Department, City of Orange, City of Orange Police Department and John Does 1-10, jointly severally or in the alternative, for compensatory damages, interest, punitive damages, attorneys fees, costs of suit and such other relief as the Court may deem just and proper.

FIFTH COUNT

1. Plaintiff repeats and re-alleges each and every allegation contained in the First, Second, Third and Fourth Counts of the Complaint as if same were more fully set forth herein at length.
2. Defendants, John Does 1-10, said names being fictitious representing unknown identities of such other individuals, supervisors, managers, supervisor of personnel, agents, contractors, subcontractors, servants, brokers and employees of the Defendants, Township of South Orange, Township of South Orange Police Department, City of Orange, City of Orange Police Department, whose actions may have caused or contributed to the injuries sustained by the Plaintiff as a result of the aforementioned police pursuit.
3. As such time as the identities of these fictitiously pleaded tortfeasors are ascertained, the Plaintiff shall seek to amend this Complaint so as to substitute the actual identities of these individuals or businesses. Plaintiff attributes each and every act alleged against the named Defendants hereto to those who are

fictitiously pleaded as if they were more specifically set forth in their entirety.

WHEREFORE, the Plaintiff, Erin Walsh, demands judgment against the Defendants, Township of South Orange, Township of South Orange Police Department, City of Orange, City of Orange Police Department and John Does 1-10, jointly severally or in the alternative, for compensatory damages, interest, punitive damages, attorneys fees, costs of suit and such other relief as the Court may deem just and proper.

CERTIFICATION

It is hereby stated that the matter in controversy is not the subject of any other action pending in any other court or of a pending arbitration proceeding to the best of our knowledge or belief. Also to the best of our knowledge or belief, no other action or arbitration proceeding is contemplated. Further, other than the parties named herein, we know of no other parties that should be joined in the above action.

JAMES P. NOLAN AND ASSOCIATES

Dated: February 8, 2011

By: _____
Eric L. Lange

JURY DEMAND

PLEASE TAKE NOTICE that pursuant to Rule 38B of the Federal Rules of Civil Procedure, Plaintiff hereby demands a trial by jury on all issues raised in this Complaint.

TRIAL COUNSEL DESIGNATION

Please be advised that Eric L. Lange, Esq. is hereby designated as trial counsel for the Plaintiff in the above entitled action.

JAMES P. NOLAN AND ASSOCIATES
Attorneys for Plaintiff

Dated: February 8, 2011

By: _____

Eric L. Lange



UNITED STATES DISTRICT COURT
for the
District of New Jersey

ERIN WALSH

Plaintiff

v.

TWP. OF SOUTH ORANGE, ET AL

Defendant

) Civil Action No.
)
)
)
)
)

SUMMONS IN A CIVIL ACTION

To: (*Defendant's name and address*) Clerk, Township of South Orange
Village Hall
101 South Orange Avenue
South Orange, New Jersey 07079

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Eric L. Lange, Esq.
James P. Nolan and Associates, LLC
61 Green Street
Woodbridge, NJ 07095
TEL: (732) 636-3344 FAX: (732) 636-1175

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

UNITED STATES DISTRICT COURT
for the
District of New Jersey

ERIN WALSH

Plaintiff

v.

TWP. OF SOUTH ORANGE, ET AL

Defendant

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)
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)
)
)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (*Defendant's name and address*) Chief of Police
Township of South Orange
201 South Orange Avenue
South Orange, New Jersey 07079

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Eric L. Lange, Esq.
James P. Nolan and Associates, LLC
61 Green Street
Woodbridge, NJ 07095
TEL: (732) 636-3344 FAX: (732) 636-1175

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

UNITED STATES DISTRICT COURT
for the
District of New Jersey

ERIN WALSH

Plaintiff

v.

TWP. OF SOUTH ORANGE, ET AL

Defendant

) Civil Action No.
)
)
)
)
)

SUMMONS IN A CIVIL ACTION

To: (*Defendant's name and address*) Clerk
City of Orange
City Hall
29 N. Day Street
Orange, New Jersey 07050

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Eric L. Lange, Esq.
James P. Nolan and Associates, LLC
61 Green Street
Woodbridge, NJ 07095
TEL: (732) 636-3344 FAX: (732) 636-1175

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

UNITED STATES DISTRICT COURT
for the
District of New Jersey

ERIN WALSH

Plaintiff

v.

TWP. OF SOUTH ORANGE, ET AL

Defendant

)
)
)
)
)
)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (*Defendant's name and address*) Chief of Police
City of Orange
29 Park Street
Orange, New Jersey 07050

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Eric L. Lange, Esq.
James P. Nolan and Associates, LLC
61 Green Street
Woodbridge, NJ 07095
TEL: (732) 636-3344 FAX: (732) 636-1175

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk